

FEDERAL ELECTION COMMISSION WASHINGTON, D.C. 20463

August 22, 2007

Craig Engle, Treasurer
D C Republican Committee Federal
Campaign Committee
1275 K Street NW Suite 102
Washington, DC 20005

Response Due Date: September 24, 2007

Identification Number:

C00191288

Reference:

April Monthly Report (3/01/07 - 3/31/07)

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. Failure to adequately respond by the response date noted above could result in an audit or enforcement action. Additional information is needed for the following 5 items:

- 1. Line 18(a) of the Detailed Summary Page of your report discloses a total of \$0.00 in transfers from non-federal account for joint activity. The sum of the entries itemized on Schedule H3, however, indicates the total to be \$6,492.00. Please amend your report to clarify the discrepancy.
- 2. Itemized disbursements must include a brief statement or description of why the disbursements were made. Please amend Schedule(s) H4 of your report to clarify the following description(s): "LDD 2007 Fundraising Expense" and "LD 2007 Expense". For further guidance regarding acceptable purposes of disbursements, please refer to 11 CFR §104.3(b)(3).
- 3. Your February Monthly Report (1/01/07 1/31/07), March Monthly Report (2/01/07 2/28/07), and April Monthly Report (3/01/07 3/31/07) combined discloses limited payments for administrative expenses. Administrative expenses are payments made for the purpose of operating a political committee including, but not limited to, rent, utilities, salaries, telephone service, office equipment and supplies. Each state, district or local party committee utilizing separate federal and non-federal accounts is required to allocate any administrative expenses (excluding salary) between the accounts according to a fixed percentage selected on Schedule H1. A

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Schedule H1 must be filed with the first FEC FORM 3X filed at the beginning of each calendar year. Payments for salary and wages for employees who spend more than 25% of their compensated time on Federal election activities or on activities in connection with a Federal election must be made from a federal account and disclosed on a Schedule B supporting Line 30(b) of the Detailed Summary Page. 11 CFR §106.7

Any goods or services provided to your committee by a person, except volunteer activity (i.e., a person's time), would be considered an in-kind contribution from that person, and would be subject to the disclosure requirements of 2 U.S.C. §434(b)(3) and 11 CFR §104.13, and the limitations and prohibitions of 2 U.S.C. §8441a and 441b.

Clarification regarding administrative expenses should be provided <u>during</u> <u>each two year election cycle</u> beginning with the first report filed in the non-election year. Please provide the necessary information regarding administrative expenses incurred by your committee and/or amend your report to disclose such expenses according to the referenced provisions of the Act and Commission Regulations.

- 4. Schedule H1 of your February Monthly Report (1/01/07 1/31/07) indicates that the federal percentage for allocated administrative, generic voter drive and exempt activity costs is 15%. However, based on Commission calculations, the federal percentage used by your committee should be 28% for the 2007-2008 election cycle. Furthermore, Schedule H4 discloses allocated disbursements based on a 15% federal ratio. Please clarify this discrepancy and transfer the excessive non-federal amount back to the non-federal account, if appropriate.
- 5. Schedule H3 of your report discloses a \$0.00 transfer from the "DC Republican Committee State Account" for the Administrative category. Please amend your report to clarify whether any funds were transferred from your non-federal account to your federal account to cover the non-federal portion of Administrative costs disclosed on Schedule(s) H4.

Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. Requests for extensions of time in which to respond will not be considered.

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Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1206.

Sincerely,

ulie A. Fleming

Campaign Finance Analyst Reports Analysis Division

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